



IDAHO
CONSERVATION
LEAGUE



BEFORE THE REGIONAL FORESTER, INTERMOUNTAIN REGION, USDA FOREST SERVICE

**IDAHO CONSERVATION LEAGUE &
THE WILDERNESS SOCIETY**
Objectors

v.

Charles Mark, Forest Supervisor
Responsible Official

**Objection to the Jim McClure-
Jerry Peak Wilderness
Management Plan Environmental
Assessment and Finding of No
Significant Impact, Salmon Challis
National Forest, BLM, Idaho Falls
District, Challis Field Office.**

Objector's contact Information:

IDAHO CONSERVATION LEAGUE: Dani Mazzotta, Objector, Central Idaho
Director, P.O Box 2671, Ketchum, ID. Phone: (208) 726.7485 ext. 0,
dmazzotta@idahoconservation.org

THE WILDERNESS SOCIETY: Craig Gehrke, Objector, Regional Director Idaho
Office, 950 W Bannock St, Boise, ID 83702 Phone: 208-343-8153,
craig_gehrke@tw.s.org

Certification of Filing

This objection was timely filed by electronic transmission to objections-intermtn-
regional-office@fs.fed.us ATTN: Objection Deciding Officer.

DATED this 1st, day of June, 2018.

Sincerely,



Dani Mazzotta, Central Idaho Director
Idaho Conservation League
dmazzotta@idahoconservation.org
(208) 726-7485



Craig Gehrke, Director
Idaho Office, The Wilderness Society
950 West Bannock Street
Suite 605
Boise, ID 83702
craig_gehrke@twc.org

Objector's Notice, Statement of Reasons & Suggested Remedies

Notice of Objection

Pursuant to 36 CFR § 218 Subparts (A) and (B), the Idaho Conservation League and The Wilderness Society hereby objects to the Jim McClure-Jerry Peak Wilderness Management Plan proposed by the Salmon Challis Forest Supervisor, Charles Mark.

Connection between prior specific comments

The Idaho Conservation League and The Wilderness Society have been engaged in discussions and deliberations on this plan prior to scoping in 2016. We submitted our initial comments on August 25th, 2016. We submitted comments in response to scoping on March, 17th, 2017 and comments in response to the draft EA on November, 27th, 2017.

Statement of Reasons

The Idaho Conservation League and The Wilderness Society have invested significant time and resources in the Wilderness designation of the Jim McClure-Jerry Peak area and in developing recommendations for the Wilderness Management Plan. We want to see this plan successfully implemented in a timely manner and in such a way that the benefits to wilderness character are realized and negative effects are successfully avoided, minimized and mitigated.

We support the overall purpose and proposed direction of the Jim McClure-Jerry Peak Wilderness Management Plan and appreciate the effort of the planning team to reach a balance with recreational use and Wilderness preservation.

However, we believe the Jim McClure – Jerry Peak Wilderness Plan and EA fails to provide adequate management direction to protect bighorn sheep from exposure to lethal pathogens carried by recreational goats. The best management practices (BMP) for pack goat management are attached to the plan as an Appendix with voluntary adoption for pack goat users. Meaningful guidance and direction is not incorporated into the plan itself. Further, there is no documentation supplied as to the effectiveness of these referenced best management practices.

We intend use the objection process as a means to strengthen the project record, participate in any objection resolution discussions with any other objectors, address any remaining issues of uncertainty around plan guidance and direction, and update the management approach for pack goat use.

Background

Bighorn sheep were designated as a USFS Sensitive Species in Region 4 nearly 10 years ago. As such, bighorn sheep are subject to agency management direction to insure that actions by the Forest Service do not contribute to bighorn declines and do not lead to listing under the Endangered Species Act.

Science that supported Sensitive Species designation has not changed. Bighorn populations continue to struggle in Idaho, largely due to diseases contracted from domestic sheep and goats. The risk of disease transmission from pack goats to bighorns remains significant and the most effective means of reducing the risk of disease transmission is to minimize the potential for contact through effective separation (of domestics and bighorns).

The risk of disease transmission from goats to bighorn sheep was recently documented in “Risk of Disease Transmission between Domestic Sheep and Goats and Rocky Mountain Bighorn Sheep”, Shoshone National Forest, April 6, 2017. This analysis provided extensive coverage of the risk that pack goats pose to bighorn populations. Key findings from this analysis include:

“...the susceptibility of bighorn sheep to population declines or extirpation due to respiratory diseases, which can be transmitted by domestic sheep or goats... is the greatest concern” (pg. 1).

“in order to maintain viable populations of bighorn sheep... there must be sufficient habitat where there is not a substantial risk for disease transmission from domestic sheep and goats. In effect, areas of domestic sheep and goat use can create ‘sink’ habitats – habitats that are otherwise suitable for bighorn sheep but in which bighorn sheep populations may be subject to disease transmission from domestics. In addition, once disease is introduced into bighorn sheep populations, they can transmit these diseases to other wild sheep populations” (pg. 1).

“The central role of domestic sheep and goats in bighorn sheep exposure to pathogens is well documented; pathogen transmission from domestics to bighorn sheep is the only supported hypothesis in experimental trials. The literature includes both circumstantial evidence linking bighorn die-offs in the wild to contact with domestic animals, and controlled experiments where healthy bighorn sheep exposed to domestic sheep and goats subsequently displayed high mortality rates” (pg. 6)

“Bighorn sheep and domestic sheep and goats are attracted to each other, particularly during rut, which increases the probability that they will make the close contact necessary for disease transmission” (pg. 6).

“... domestic sheep and goats carry different suites of pathogens. As a result, any time contact occurs between domestics and bighorn sheep populations, the potential for transmission of novel agents to naïve bighorns exists.” (pg. 6).

“...there is an abundance of ... evidence that leads to a reasonable conclusion that domestic goats are a vector (of infectious pathogens). Domestic goats are physiologically capable of carrying and spreading several of the bacteria that are implicated in wild sheep die-offs. Domestic goats may approach bighorn sheep as stray animals from ... supporting back-country recreation” (pg. 8).

“The literature that does exist indicates a connection between contact between domestic goats and bighorn sheep and disease transmission. For example, the cause of a bighorn die-off in the winter of 1995-96 in Hells Canyon was traced to DNA fingerprinting to a domestic goat that had been recently released in the wild.... The subsequent die-off resulted in the death of more than 260 bighorn sheep in an 8-week period. The disease spread more than 30 air miles and affected six bighorn sheep herds” (pg. 8).

“... the introduction of a new genotype of (pneumonia) into a chronically infected bighorn sheep population in Hells Canyon was accompanied adult morbidity (100%) and pneumonia-induced mortality (33%).... analysis showed that the strain associated with the outbreak was likely of domestic goat origin. The lack of cross-strain immunity in the face of recurrent spillovers from reservoir hosts may account for a significant proportion of the disease outbreaks in bighorn sheep that continue to happen regularly despite a century of exposure to domestic sheep and goats” (pg. 9).

“Domestic goats can also carry other disease organisms with serious consequences for bighorn sheep.... The Silver Bell bighorn herd in Arizona was infected with keratoconjunctivitis... a highly contagious eye infection common in domestic sheep and goats” (pg. 9).

“...lungworms from co-pastured domestic goats infected bighorn sheep. Lungworm larvae deposited in animal feces are hosted by several species of land snails and remain in the snail until accidentally ingested by bighorn sheep. Lungworms inhabit the air passages of the lungs and can make wild sheep more susceptible to bacterial pneumonia.... Bighorn sheep that occupy habitat with domestic goats are at potential risk of acquiring (lungworm) infections, thus increasing the potential risk of pneumonia” (pg. 9).

“When bighorn sheep experience a pneumonia episode, all-age die-off normally occurs.... As a result, full population recovery following a die-off may require decades. Loss of genetic diversity and herd memory of historical migration routes may be irreplaceable” (pg. 10).

“Bighorn sheep make occasional long-distance exploratory movements beyond their core home ranges...called forays...this life-history trait places bighorn sheep at risk for contact with domestic sheep and goats.... The

foray behavior of wild sheep where individuals can travel up to 50 km facilitates the spread of disease... for other animals in the same herd or other populations through natural movements...(pg 11).

“On November 14, 2011 a temporary area closure order was signed and implemented restricting domestic goat use on the Clarks Fork, Wapiti, Greybull and Wind River Ranger Districts.... This closure was implemented to reduce the risk of disease transmission from pack goats to core native bighorn herds. The pack goat closure order was issued again in June 2016 and will remain in effect until December 31, 2019” (pg. 12).

“... the most effective means of reducing the risk of disease transmission is to minimize the potential for contact through effective separation (of domestics and bighorns)” (pg. 29).

In its risk analysis, the Shoshone National Forest found that in several of the forest’s bighorn sheep herds, the risk of contact was “High” if pack goats were allowed in native bighorn sheep populations, putting those bighorn at risk of disease infection. If pack goats were prohibited, there would be a “Low” risk of contact and reduced risk of disease transmission.

Further, the risk of contact analysis evaluated certain best management practices offered regarding the management of pack goats in bighorn habitat. Potential deficiencies in the practices were identified:

“... pack goat users may be disinclined to report contact between their goats and bighorn sheep, or even lost goats, for fear of incurring additional restrictions on their use” (pg. 30).

“...users may not always be able to control their pack goats despite implementation of (suggested practices). Pack goat use occurs in remote, rugged settings where circumstances cannot always be controlled, and pack goats occasionally are lost for a variety of reasons.... Even conscientious pack goat users may not always be successful controlling their goats.... It is perceived as dangerous to have goats tied together by leads when traveling through difficult terrain and users typically disconnect them from each other in such settings.

I. Possibility of NFMA violations

If the Forest Service selects the proposed action as outlined in the Wilderness Management Plan for the Jim McClure-Jerry Peak Wilderness with regards to recreational pack goat use, we are concerned that this may potentially represent a violation of FSM2670 and FSM2672 and be in conflict with direction provided for the protection of Sensitive Wildlife Species in the Land Resource Management Plan for the Challis National Forest.

Suggested Remedies

Pack Goat Use

Reliance on solely on the implementation of best management practices that are an appendix to the Wilderness Management Plan, particularly when the Forest Service has provided no documentation of their effectiveness, is not sufficient for reducing the risk of disease transmission from pack goats to bighorns. Instead we suggest the following:

- The Forest Service should implement a closure order on recreational pack goat use in the Jim McClure – Jerry Peak Wilderness Area to protect bighorns in the region from diseases carried by pack goats.
- The Wilderness Management Plan should include a recommendation for closure of the vacant East Pass Creek sheep and goat allotment.

Plan Direction

Should other objectors raise additional concerns or bring additional information to the Forest Service's attention, we ask to be included in the objection resolution process, including reviewing information and offering perspective on any requested plan modifications. We are concerned that if another party requests changes and if the final decision differs substantially from the proposed plan direction, the final outcome may not strike an appropriate balance among plan goals. Furthermore, if the analysis in the EA is not sufficient to support these requested changes, the plan may not be implemented in a timely manner.

It would be our preference to reach a resolution within the objection process timeframe instead of deferring a final decision to the Objection Reviewing Officer.

###